

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 18 B 27990
Amber Nickson,)	HON. TIMOTHY A. BARNES
)	CHAPTER 13
DEBTOR.)	

NOTICE OF MOTION

To: Trustee Marilyn O Marshall, 224 South Michigan Ave. Suite 800, Chicago, IL 60604;
CTA, 210 W. 79th St, Chicago, IL 60620;

See Attached Service List.

Please take notice that on May 21, 2020, at 1:30 p.m., I shall appear before the Honorable Timothy A. Barnes in Courtroom 744 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached motion.

That a party who objects to the motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on May 11, 2020.

/s/ Alexander Nohr
Attorney for Debtor
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603

Label Matrix for local noticing
0752-1

Case 18-27990
Northern District of Illinois
Eastern Division
Mon May 11 16:31:25 CDT 2020

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Broadway Financial
3755 N Halsted St
Chicago, IL 60613-3906

(p)PERI GARITE
ATTN CARD WORKS
101 CROSSWAYS PARK DR W
WOODBURY NY 11797-2020

TBOM/TFC
PO BOX 13306
VIRGINIA BEACH, VA 23464

WF/BOBS FN
PO BOX 14517
DES MOINES, IA 50306-3517

Amber Nickson
10732 S Rhodes Ave
Chicago, IL 60628-3714

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

U.S. BANK NATIONAL ASSOCIATION
14841 Dallas Parkway, Suite 425
Dallas, TX 75254-8067

ATG CREDIT
1700 W CORTLAND ST STE 2
CHICAGO, IL 60622-1131

CHICAGO AVE GARAGE FCU
4909 W Division St Suite 403
Chicago, IL 60651-3161

Speedy Cash
1218 N Lake St Ste 120
Aurora, IL 60506-2476

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

Wells Fargo Bank, N.A.
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Rodion Leshinsky
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603-1811

U.S. BANK NATIONAL ASSOCIATION
c/o Codilis & Associates, P.C.
15W030 N. Frontage Road, Suite 100
Burr Ridge, IL 60527-6921

BROADWAY LOAN CO
3755 N HALSTED ST
CHICAGO, IL 60613-3906

FNB OMAHA
1620 DODGE ST
OMAHA, NE 68197-0003

SpeedyRapid Cash
po box 780408
wichita, KS 67278-0408

US BANK HOME MORTGAGE
777 E Wisconsin Ave
Milwaukee, WI 53202-5370

Alexander Preber
The Semrad Law Firm, LLC
20 S. Clark St, 28th Floor
Chicago, IL 60603-1811

Patrick Semrad
The Semrad Law Firm, LLC
20 S. Clark St, 28th Floor
Chicago, IL 60603-1811

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

First National Bank of Omaha
1620 Dodge Street, Stop code 3105
Omaha, NE 68197

U.S. Bank National Association
c/o U.S. Bank Home Mortgage,
a division of U.S. Bank N.A.
4801 Frederica Street
Owensboro, Kentucky 42301

End of Label Matrix
Mailable recipients 22
Bypassed recipients 0
Total 22

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FOR THE NORTHERN DISTRICT OF ILLINOIS
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MOTION TO VACATE PAYROLL ORDER

NOW COMES the Debtor, Amber Nickson, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and hereby moves this Honorable Court to vacate the Order for Payroll Control entered on October 5, 2018. Debtor states the following:

1. That this Court has jurisdiction over this proceeding pursuant to 28 U.S.C. §§1334 & 157. This is a core proceeding pursuant to 28 U.S.C. §157.
2. On October 4, 2018, the Debtor filed the above captioned voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
3. On October 5, 2018, this Honorable Court entered an Order directing Debtor, Amber Nickson's employer CTA to deduct \$450.00 each month from Debtor's paychecks for Chapter 13 Trustee Plan payments.
4. That Debtor's hours have been severely reduced due to the Covid-19 crisis.
5. Thus Debtor wishes to amend the order for payroll control to reflect that CTA, employer to Amber Nickson, deduct from the earnings of the debtor the sum of \$225.00 each month beginning on the next pay day following the receipt of this order and to pay the sum so deducted to Marilyn O. Marshall, Trustee at least once a month.
6. That the foregoing constitutes sufficient grounds for this Court to enter an Order vacating the Order for Payroll Control entered on October 5, 2018.

WHEREFORE, Amber Nickson, Debtor, respectfully requests this Honorable Court enter an Order amending the Order for Payroll Control at docket entry number 10, and for such other and further relief as this Court deems fair and just.

Respectfully submitted,

/s/ Alexander Nohr
Attorney for the Debtors

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625